UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

AMERICAN HOTEL INTERNATIONAL GROUP, INC., et al.,

Plaintiffs/Counterclaim Defendant,

-against-

ONEBEACON INSURANCE COMPANY and POTOMAC INSURANCE COMPANY OF ILLINOIS.

Defendants/Counterclaim Plaintiff.

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01 Civ. 0654 (CM) (MHD) ECF CASE

NOTICE OF MOTION FOR LEAVE TO REGISTER JUDGMENT IN ANOTHER DISTRICT

## MEMO ENDORSEL

PLEASE TAKE NOTICE that, based upon the accompanying Memorandum of Law and Declaration in support, Defendant and Counterclaim Plaintiff OneBeacon Insurance Company (hereinafter "OneBeacon") hereby moves the Court for an order pursuant to 28 U.S.C. §1963 permitting OneBeacon to register the final judgment entered against Aramarine Brokerage, Inc. in the United States District Court for the District of New Jersey. Such an order is appropriate for "good cause shown," and should be issued in this case because Aramarine has failed to file an appeal bond or otherwise satisfy the judgment during the pendency of the appeal and likely has assets located in its current home jurisdiction, New Jersey. For a complete statement of reasons, please see the accompanying Memorandum of Law.

Dated: July 7, 2009

Respectfully submitted,

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